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March 20, 1995

Mr. Frank Battaglia, Project Manager  
United States Environmental Protection Agency- Region I  
90 Canal Street, Waste Management Building  
Boston, Massachusetts 02114

**RE: PROPOSED SCHEDULE  
CIBA-GEIGY SITE, CRANSTON, RHODE ISLAND**

Dear Mr. Battaglia:

As discussed on the telephone recently, Ciba would like to propose a comprehensive schedule for the Site that would integrate the RFI/CMS reports with the Interim Remedial Measures (IRMs). We plan to voluntarily remove the PCB contaminated soil from the Production Area and the Warwick Property in May and are committed to starting up the Stabilization IRM by the end of September. However, the construction schedule for the Stabilization IRM is extremely tight because of our plans to remove the PCB contaminated soil first.

Ciba is continuing to negotiate with the City of Cranston to consolidate their Public Works Department into the adjacent buildings 20/26 and warehouses 15/25. Simultaneously we are developing a third IRM for removal of sediment material from the former Cofferdam Area in the Pawtuext River. Completion of these three IRMs (PCB soil removal, groundwater stabilization with soil vapor extraction, and sediment material removal) by the end of 1995 will enable the City to move in a reasonable time frame.

The current schedule for remedial activities at the Cranston RCRA Site is:

<u>Milestone</u>	<u>Date(s)</u>
Submit PCB Soil Removal IRM (complete)	3/13/95
Submit Cofferdam Sediment Removal IRM	4/28/95
Remove PCB Soils	5/1 - 6/2/95
Submit Site RFI	6/30/95
Submit Site CMS	9/22/95
Startup Stabilization IRM	9/29/95
Excavate Cofferdam Sediment Material	10/2 - 11/10/95
Submit River RFI	3/29/96
Submit River CMS	6/29/96




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This is a very ambitious schedule, which has the advantage of completing the RFI/CMS reports and the IRMs in a phased manner allowing the City of Cranston to occupy the adjacent buildings/warehouses and the Production Area in a reasonable time frame. It is also our intent to incorporate the results of the soil and sediment removal IRMs in the Site CMS and the River CMS, respectively. This should provide a complete picture of the necessary corrective actions. Finally, we realize that the EPA will have to approve any changes in the schedule where a submittal deadline has already been established, such as the River RFI and CMS. Detailed justification for changes would be provided once the EPA has reviewed and commented on the overall proposed schedule. We recognize that the proposed schedule may require modification of the existing ACO for the river which could be accomplished by revising/modifying the Workplan for the river.

Ciba would like to review this schedule with EPA and present the River IRM at a meeting on April 12. Since RIDEM and the City are critical to the success of these IRMs and their implementation, we would also like them to attend this meeting, along with our consultants, Woodward Clyde and PTRL Environmental Services. The discussions and presentations would be brief and informal such as the December 1994 PCB Soil IRM meeting in your Boston office. Dr. Barry J. Berdahl, our Project Manager (908) 914-2715 will coordinate Ciba activities and answer any questions regarding this letter.

Sincerely,

  
Daniel C. McIntyre  
Director of Remediation